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From: Garrison, Karen [mailto:kgarrison@nrdc.org]

Sent: Friday, January 14, 2005 2:16 PM

**To:** Melissa Miller-Henson; MLeoWeber@aol.com **Cc:** Rod\_Fujita@environmentaldefense.org

Subject: comments on Central Coast Project Area

Rod and I would like to submit the attached comments on the Central Coast Project Area criteria, reiterating those I made at the Task Force meeting in Long Beach. We appreciate the recent changes.

Thanks, Karen

Karen Garrison Natural Resources Defense Council 111 Sutter Street, 20th Floor San Francisco, CA 94104

Tel: 415.875.6100 Fax: 415.875.6161



environmental defense finding the ways that work

January 14, 2005

Chairman Phil Isenberg MLPA Blue Ribbon Task Force California Resources Agency 1416 Ninth Street, Suite 1311 Sacramento, CA 95814

Re: Comments on Central Coast MLPA Project Area

Dear Chairman Isenberg:

On behalf of the Natural Resources Defense Council (NRDC) and Environmental Defense and many members, we would like to supplement our earlier comments on the criteria for selecting the Central Coast MLPA Project Area. We applaud your recent additions, and thank you for considering our comments.

<u>Large enough for useful lessons</u>. We support suggestions made at the science panel meeting on January 7, which we paraphrase as follows: if the project area is to serve as a useful building block, it should be large enough to give us experience with a broad range of issues likely to come up in future phases, including network design issues. To that end, it should be large enough to allow for replication of sites in diverse habitats. We also agree with statements by the economists at the meeting that the most useful project area would include a diversity of human uses and diversity in the intensity of human uses.

<u>Fuzzy biogeography</u>. Scientists also suggested that MLPA biological goals would more likely be met if the project area encompassed a region that roughly reflects biogeographic divisions or "punctuation marks" (e.g. San Francisco Bay to Point Conception). A sport fisherman noted that fishermen often fish a certain radius around a port, not on one side or the other of a biogeographic division. A project area edge running right down the middle of the Golden Gate could require fishermen to participate in two separate siting processes, whereas including a broader area around a port (e.g. up to Point Reyes or Bodega Head) could mitigate that problem. Scientists responded that the biological dividers were fuzzy enough to take those social factors into account. We support the selection of biogeographically-based borders with socially-based fuzzy ends.

Sincerely,

Karen Garrison, NRDC

Rod Fujita, Environmental Defence

Cc: Melissa Miller-Henson, Mike Weber